

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:**

<b>Kenneth Imes and Michelle Imes</b>	<b>:</b>	<b>Chapter 7</b>
	<b>:</b>	
<b>Debtors</b>	<b>:</b>	<b>Case No.: 24-14566</b>

**MOTION OF WITHDRAWAL TO CONVERT CASE TO CHAPTER 13**

**COME NOW**, that the Debtors, Kenneth and Michelle Imes, by and through their counsel who filed this Motion to withdraw the Motion to Convert Case from Chapter 7 to Chapter 13, which was filed on April 28, 2025 and hereby avers that:

1. The Debtors have reconsidered and no longer wish to pursue conversion to Chapter 13.  
the Debtors respectfully request this Honorable Court to withdraw the Motion to Convert, and cancel the hearing scheduled for May 27<sup>th</sup>, 2025, at 11am.

**WHEREFORE**, the Debtors' Respectfully request that this Honorable Court permits withdrawal of the Motion to Convert to Chapter 13.

**Respectfully submitted by,**

**Dated:** May 22, 2025

/s/Joseph Bambrick  
**JOSEPH T. BAMBRICK JR, ESQUIRE**  
**529 READING AVENUE**  
**WEST READING PA 19611**  
**Phone 610-372-6400**  
**Fax 610-372-9483**